

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

JANE DOE,

Case No. **2:21-cv-12492**

Plaintiff,

v.

DAVID BAUM, ELIZABETH  
SENEY, MARGARET GYTEKO,  
CHUNG OWYANG,

Defendants.

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**JOINT STIPULATION AND ORDER FOR LEAVE TO FILE AN  
AMENDED COMPLAINT**

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**NOW COMES** Plaintiff JANE DOE and Defendants DAVID BAUM, ELIZABETH SENEY, and CHUNG OWYANG, by and through their attorneys, with this Joint Stipulation and [Proposed] Order Regarding Amended Complaint and hereby stipulates as follows:

**JOINT STIPULATION  
AND [PROPOSED] ORDER  
REGARDING AMENDED  
COMPLAINT**

1. Plaintiff filed her Complaint in this case on October 22, 2021.
2. As of the date of this stipulation, Defendants have not answered the Complaint.
3. Since filing this Complaint, counsel for all parties have met and conferred regarding certain aspects of the Complaint, including the causes of action.
4. As a result, the parties have stipulated to the following terms.
  - a) Plaintiff will have leave to file an Amended Complaint, which will be due within fourteen (14) days of the date when this Stipulation and Order are signed.
  - b) Plaintiff retains the right to file a Second Amended Complaint, if necessary, without leave of court pursuant to, and accordance with, Federal Rules of Civil Procedure Rule 15.
  - c) Defendants shall have until February 28, 2022, or (45) days after service of Plaintiff's Amended Complaint, to respond or answer to the Amended Complaint, whichever date is later.

**WHEREFORE** the Parties request that the Court approve the foregoing stipulation.

Date: January 7, 2022

Date: January 7, 2022

Respectfully Submitted,

Respectfully Submitted,



Keith Altman, Esq.  
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*Attorneys for Defendants*

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**IT IS SO ORDERED.**

Date: January 11, 2022

s/Robert H. Cleland

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United States District Judge

**JOINT STIPULATION  
AND [PROPOSED] ORDER  
REGARDING AMENDED  
COMPLAINT**